

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

**JANE DOE,**

**Plaintiff,**

**v.**

**RECTOR AND VISITORS OF THE  
UNIVERSITY OF VIRGINIA,**

**Defendant.**

**Case No. 3:23-cv-00018-RSB**

**DEFENDANT'S MOTION TO SEAL**

Defendant the Rector and Visitors of the University of Virginia, through counsel, moves this Court to permit it to file certain exhibits to its Reply Brief in Support of Motion for Summary Judgment (ECF No. 96) under seal pursuant to Local Rule 9. Defendant seeks to file records relating to Plaintiff's discovery responses under seal. This Court should permit sealing of these exhibits because they contain highly sensitive information. Also, these records could be used to determine the true identity of Plaintiff who is proceeding under a pseudonym. Plaintiff supports the granting of this motion.

For these reasons, and as explained in more detail in Defendant's Memorandum in Support filed contemporaneously with this Motion, Defendant move this Court under Local Rule 9 to enter an Order permitting Defendant to file under seal certain exhibits in support of its Reply Brief in Support of Motion for Summary Judgment (ECF No. 96).

Respectfully submitted,

**THE RECTOR AND VISITORS OF THE  
UNIVERSITY OF VIRGINIA**

By Counsel: /s/ Christopher P. Bernhardt

Christopher P. Bernhardt\* (VSB No. 80133)

Assistant Attorney General

Office of the Virginia Attorney General

202 North 9th Street

Richmond, Virginia 23219

Telephone: (804) 371-0977

Facsimile: (804) 371-2087

Email: cbernhardt@oag.state.va.us

*\*Counsel of Record for Defendant*

Amy E. Hensley\* (VSB No. 80470)

Associate University Counsel/Assistant Attorney  
General

1827 University Avenue

Charlottesville, Virginia 22904

Telephone: (434) 924-3685

Email: aehensley@virginia.edu

*\*Counsel of Record for Defendant*

Jason S. Miyares  
Attorney General of Virginia

Thomas J. Sanford  
Deputy Attorney General

Jacqueline C. Hedblom  
Senior Assistant Attorney General/ Trial Section Chief

**CERTIFICATE**

I hereby certify that on October 23, 2024, I electronically filed the foregoing with the Clerk  
of the Court using the CM/ECF system.

/s/ Christopher P. Bernhardt

Christopher P. Bernhardt\* (VSB No. 80133)

Assistant Attorney General